

# EXHIBIT A



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6/17/2021 4:54 PM

IRIS Y. MARTINEZ

CIRCUIT CLERK

COOK COUNTY, IL

13733376

2120 - Served                      2121 - Served                      2620 - Sec. of State  
 2220 - Not Served                2221 - Not Served                2621 - Alias Sec of State  
 2320 - Served By Mail            2321 - Served By Mail  
 2420 - Served By Publication    2421 - Served By Publication  
 Summons - Alias Summons

(12/01/20) CCG 0001 A

## IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

Tim Corse and Terese Corse

Plaintiff(s)

2021L006260

v.

Lendlease (US) Construction, Inc., By and  
 Through its agents, employees and/or apparent

Defendant(s)

C T Corporation Systems, 208 S LaSalle St., Ste.  
 814, Chicago, IL 60604

Address of Defendant(s)

Case No. \_\_\_\_\_

Please serve as follows (check one): ☐ Certified Mail ☒ Sheriff Service ☐ Alias

## SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

## THERE WILL BE A FEE TO FILE YOUR APPEARANCE.

To file your written appearance/answer **YOU DO NOT NEED TO COME TO THE COURTHOUSE.** You will need: a computer with internet access; an email address; a completed Appearance form that can be found at <http://www.illinoiscourts.gov/Forms/approved/procedures/appearance.asp>; and a credit card to pay any required fees.

Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois  
[cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org)



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**Summons - Alias Summons****(12/01/20) CCG 0001 B**

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Please call or email the appropriate clerk's office location (on Page 3 of this summons) to get your court hearing date AND for information whether your hearing will be held by video conference or by telephone. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

**NOTE: Your appearance date is NOT a court date. It is the date that you have to file your completed appearance by. You may file your appearance form by e-filing unless you are exempted.**

A court date will be set in the future and you will be notified by email (either to the email address that you used to register for e-filing, or that you provided to the clerk's office).

**CONTACT THE CLERK'S OFFICE** for information regarding COURT DATES by visiting our website: [cookcountyclerkofcourt.org](http://cookcountyclerkofcourt.org); download our mobile app from the AppStore or Google play, or contact the appropriate clerk's office location listed on Page 3.

To the officer: (Sheriff Service)

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☉ Atty. No.: 49741

○ Pro Se 99500

Name: Miguel A. Ruiz

Atty. for (if applicable):

Cogan & Power, P.C.

Address: 1 E. Wacker Dr., Ste. 510

City: Chicago

State: IL Zip: 60601

Telephone: 312-477-2500

Primary Email: mruiiz@coganpower.com

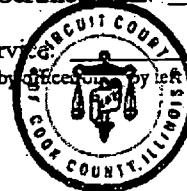
Witness date \_\_\_\_\_

6/17/2021 4:54 PM IRIS Y. MARTINEZ

IRIS Y. MARTINEZ, Clerk of Court

☐ Service by Certified Mail: \_\_\_\_\_

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(To be inserted by officer or by left with employer or other person)



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## GET YOUR COURT DATE BY CALLING IN OR BY EMAIL

**CALL OR SEND AN EMAIL MESSAGE** to the telephone number or court date email address below for the appropriate division, district or department to request your next court date. Email your case number, or, if you do not have your case number, email the Plaintiff or Defendant's name for civil case types, or the Defendant's name and birthdate for a criminal case.

### **CHANCERY DIVISION**

**Court date EMAIL:** ChanCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-5133

### **CIVIL DIVISION**

**Court date EMAIL:** CivCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-5116

### **COUNTY DIVISION**

**Court date EMAIL:** CntyCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-5710

### **DOMESTIC RELATIONS/CHILD SUPPORT DIVISION**

**Court date EMAIL:** DRCourtDate@cookcountycourt.com  
OR

ChildSupCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-6300

### **DOMESTIC VIOLENCE**

**Court date EMAIL:** DVCourtDate@cookcountycourt.com

**Gen. Info:** (312) 325-9500

### **LAW DIVISION**

**Court date EMAIL:** LawCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-5426

### **PROBATE DIVISION**

**Court date EMAIL:** ProbCourtDate@cookcountycourt.com

**Gen. Info:** (312) 603-6441

### **ALL SUBURBAN CASE TYPES**

#### **DISTRICT 2 - SKOKIE**

**Court date EMAIL:** D2CourtDate@cookcountycourt.com

**Gen. Info:** (847) 470-7250

#### **DISTRICT 3 - ROLLING MEADOWS**

**Court date EMAIL:** D3CourtDate@cookcountycourt.com

**Gen. Info:** (847) 818-3000

#### **DISTRICT 4 - MAYWOOD**

**Court date EMAIL:** D4CourtDate@cookcountycourt.com

**Gen. Info:** (708) 865-6040

#### **DISTRICT 5 - BRIDGEVIEW**

**Court date EMAIL:** D5CourtDate@cookcountycourt.com

**Gen. Info:** (708) 974-6500

#### **DISTRICT 6 - MARKHAM**

**Court date EMAIL:** D6CourtDate@cookcountycourt.com

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☉ Atty. No.: 49741

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Name: Miguel A. Ruiz

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Address: 1 E. Wacker Dr., Ste. 510

City: Chicago

State: IL Zip: 60601

Telephone: 312-477-2500

Primary Email: mruiz@coganpower.com

Witness date \_\_\_\_\_

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IRIS Y. MARTINEZ, Clerk of Court

☐ Service by Certified Mail: \_\_\_\_\_

☐ Date of Service \_\_\_\_\_  
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12-Person Jury

**Civil Action Cover Sheet - Case Initiation**

(12/01/20) CCL 0520

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CIRCUIT CLERK  
COOK COUNTY, IL

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS**  
**COUNTY DEPARTMENT, LAW DIVISION**

Tim Corse and Terese Corse

v.

13733376

Lendlease (US) Construction, Inc./ By and through its agents, employees and/or apparent agents

No. 2021L006260

**CIVIL ACTION COVER SHEET - CASE INITIATION**

A Civil Action Cover Sheet - Case Initiation shall be filed with the complaint in all civil actions. The information contained herein is for administrative purposes only and cannot be introduced into evidence. Please check the box in front of the appropriate case type which best characterizes your action. Only one (1) case type may be checked with this cover sheet.

Jury Demand ☒ Yes ☐ No**PERSONAL INJURY/WRONGFUL DEATH****CASE TYPES:**

- ☐ 027 Motor Vehicle  
☐ 040 Medical Malpractice  
☐ 047 Asbestos  
☐ 048 Dram Shop  
☐ 049 Product Liability  
☐ 051 Construction Injuries  
 (including Structural Work Act, Road  
 Construction Injuries Act and negligence)  
☐ 052 Railroad/FELA  
☐ 053 Pediatric Lead Exposure  
☒ 061 Other Personal Injury/Wrongful Death  
☐ 063 Intentional Tort  
☐ 064 Miscellaneous Statutory Action  
 (Please Specify Below\*\*)  
☐ 065 Premises Liability  
☐ 078 Fen-phen/Redux Litigation  
☐ 199 Silicone Implant

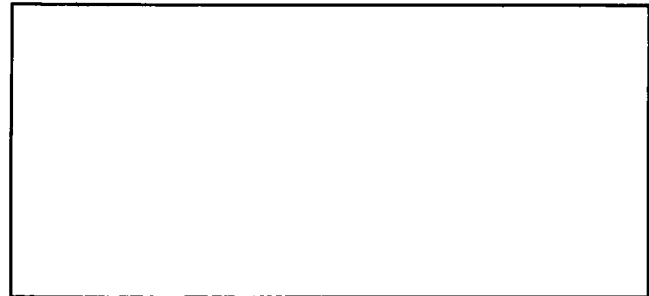
**TAX & MISCELLANEOUS REMEDIES****CASE TYPES:**

- ☐ 007 Confessions of Judgment  
☐ 008 Replevin  
☐ 009 Tax  
☐ 015 Condemnation  
☐ 017 Detinue  
☐ 029 Unemployment Compensation  
☐ 031 Foreign Transcript  
☐ 036 Administrative Review Action  
☐ 085 Petition to Register Foreign Judgment  
☐ 099 All Other Extraordinary Remedies

By: Miguel. A. Ruiz, Esq.

(Attorney)

(Pro Se)



(FILE STAMP)

**COMMERCIAL LITIGATION****CASE TYPES:**

- ☐ 002 Breach of Contract  
☐ 070 Professional Malpractice  
 (other than legal or medical)  
☐ 071 Fraud (other than legal or medical)  
☐ 072 Consumer Fraud  
☐ 073 Breach of Warranty  
☐ 074 Statutory Action  
 (Please specify below.\*\*)  
☐ 075 Other Commercial Litigation  
 (Please specify below.\*\*)  
☐ 076 Retaliatory Discharge

**OTHER ACTIONS****CASE TYPES:**

- ☐ 062 Property Damage  
☐ 066 Legal Malpractice  
☐ 077 Libel/Slander  
☐ 079 Petition for Qualified Orders  
☐ 084 Petition to Issue Subpoena  
☐ 100 Petition for Discovery

\*\*

Primary Email: mruiz@coganpower.com

Secondary Email: sdavis@coganpower.com

Tertiary Email: dbarreto@coganpower.com

**Pro Se Only:** ☐ I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice form the Clerk's Office for this case at this email address:

IRIS Y. MARTINEZ, CLERK OF THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS





ILED  
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IRIS Y. MARTINEZ  
CIRCUIT CLERK  
COOK COUNTY, IL

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS  
COUNTY DEPARTMENT, LAW DIVISION**

TIM CORSE and TERESE CORSE )

Plaintiffs, )

v. )

NO: 2021L006260

LENDLEASE (US) CONSTRUCTION, INC., )

By and through its agents, employees, and/or )

Apparent agents, )

Defendant. )

**COMPLAINT AT LAW**

NOW COME the Plaintiffs, TIM CORSE and TERESE CORSE, by and through their attorneys, COGAN & POWER, P.C., and complaining of the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, state as follows:

**COUNT I**

1. At all times relevant hereto, the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, was and is a foreign corporation organized under the laws of Florida and licensed to conduct business in Illinois.

2. On and before January 13, 2021, construction of a multi-unit residential building was underway at the property located at 188-224 N. Harbor Drive, City of Chicago, County of Cook, State of Illinois (hereinafter referred to as "job site").

3. On and before January 13, 2021, the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, contracted



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to perform certain construction related services on the job site including but not limited to acting as the general contractor and/or construction manager.

4. On January 13, 2021, the Plaintiff, TIM CORSE, was an invitee on the job site.

5. On January 13, 2021, the Plaintiff, TIM CORSE, was directed to the 24<sup>th</sup> floor of the KL building under construction at the job site to perform certain electrical work.

6. On January 13, 2021, the Plaintiff, TIM CORSE, was required to enter a unit on the 24<sup>th</sup> and enter an IVF closet to complete his work.

7. On January 13, 2021, while carrying materials to the IVF closet in a unit on the 24<sup>th</sup> floor of the KL building, the Plaintiff, TIM CORSE, was caused to trip and fall from materials, tools, and debris on the floor.

8. At all times relevant hereto, it was the duty of the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, to exercise reasonable care and caution in the performance, management, control, supervision, and inspection, of the work on the premises in order to avoid injuries to those lawfully on the premises, including the Plaintiff, TIM CORSE.

9. On January 13, 2021, notwithstanding its aforesaid duties, the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, was then and there guilty of one or more of the following acts and/or omissions:

- a. Failed to inspect the job site for unsafe conditions;
- b. Failed to enforce cleanliness on the jobsite to avoid the creation of tripping hazards;
- c. Failed to warn of unsafe conditions;
- d. Directed the work to be done in an unsafe manner;
- e. Failed to provide proper equipment for debris management on the job site;



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- f. Failed to schedule or sequence the work so that materials, tools, and debris did not cause an unsafe condition.
- g. Failed to follow OSHA rules and industry customs and practices for working surfaces;
- h. Failed to supervise sub-contractors while they were performing work on the job site;
- i. Failed to ensure that subcontractors received property training before working on the job site; and
- j. Failed to ensure subcontracts did not create unsafe conditions.

10. As a proximate result of one or more of the aforesaid wrongful acts and/or omissions of the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, the Plaintiff, Tim Corse suffered personal and pecuniary injuries and will continue to in the future.

WHEREFORE the Plaintiff, TIM CORSE, moves this Honorable Court to enter judgment against the Defendant, LENDLEASE (US) CONSTRUCTION, INC., in an amount in excess of the jurisdictional limits of this Court, plus costs.

## COUNT II

1-10. The Plaintiff, TERESE CORSE, reasserts and realleges paragraphs one (1) through eleven (10) of Count I as if fully set forth herein as paragraphs one (1) through eleven (10) of Count II.

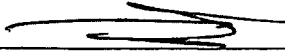
11. At all relevant times herein, the Plaintiff, TERESE CORSE, was and is the legal spouse of TIM CORSE.

12. As a proximate result of the aforesaid negligent acts and/or omissions of the Defendants and as a result of the injuries suffered by TIM CORSE, TERESE CORSE, was and will be deprived of the services and companionship of her husband, TIM CORSE.



\* 5 0 0 8 6 8 5 4 \*

WHEREFORE the Plaintiff, TERESE CORSE, moves this Honorable Court to enter judgment against the Defendant, LENDLEASE (US) CONSTRUCTION, INC., by and through its agents employees, and/or apparent agents, in an amount in excess of the jurisdictional limits of this Court, plus costs.

  
\_\_\_\_\_  
Attorney for the Plaintiffs

Miguel A. Ruiz, Esq.  
Sara M. Davis, Esq.  
**COGAN & POWER, P.C.**  
1 E. Wacker Drive, Suite 510  
Chicago, IL 60601  
Telephone: (312) 477-2500  
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[sdavis@coganpower.com](mailto:sdavis@coganpower.com)  
Firm Id. 49741